

Ashlee B. Hesman
Nevada Bar No. 012740
STRUCK LOVE BOJANOWSKI & ACEDO, PLC
3100 West Ray Road, Suite 300
Chandler, Arizona 85226
Tel.: (480) 420-1600
Fax: (480) 420-1695
ahesman@strucklove.com

Gina G. Winspear
Nevada Bar No. 005552
DENNETT WINSPEAR, LLP
3301 North Buffalo Drive, Suite 195
Las Vegas, Nevada 89129
Tel.: (702) 839-1100
Fax: (702) 839-1113
GWinspear@dennettwinspear.com

Attorneys for Defendant CoreCivic

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ATLP, a minor, by and through his Guardian
Ad Litem Tyloria Taylor; and AJB, a minor,
by and through his Guardian Ad Litem
Tyloria Taylor, and Tyloria Taylor as Co-
Special Administrator of the Estate of Brandon
Lavon Patton, Deceased,

Plaintiffs,

v.

CoreCivic, Inc., formerly Corrections
Corporation of America, a foreign corporation
d/b/a Nevada Southern Detention Center; Doe
CoreCivic Employees I through XX; Does I
through X; and Roe Entities I through X,
inclusive,

Defendants.

Case No. 2:21-cv-02072-JCM-EJY

**JOINT STIPULATION TO
EXTEND DEADLINE TO REPLY
TO MOTION TO DISMISS**

(First Request)

Plaintiffs Tyloria Taylor, as Co-Special Administrator of the Estate of Brandon Patton, ATLP, and AJB (collectively, "Plaintiffs") and Defendant CoreCivic, Inc. ("Defendant"), through their respective undersigned counsel, hereby submit this Joint Stipulation to Extend Deadline to Reply to Motion to Dismiss (First Request).

Defendant filed its Motion to Dismiss Plaintiffs' Complaint on March 7, 2022 (Dkt. 14), and Plaintiffs filed their Response in opposition on April 4, 2022 (Dkt. 17). Currently,

1 Defendant's deadline to file its Reply is Monday, April 11, 2022. Due to several other
2 conflicting deadlines in the upcoming week, including attending three depositions, Plaintiffs'
3 counsel stipulated to allow Defendant up until Monday, April 25, 2022 to file its Reply. This
4 is the first stipulation for an extension of time to file Defendant's Reply in Support of Motion
5 to Dismiss. *See* LR IA 6-1.

6 The parties therefore respectfully request that the Court approve the parties'
7 Stipulation to extend the deadline for Defendant to file its Reply from April 11, 2022 to April
8 25, 2022.

9 DATED this 11th day of April 2022.

10 STRUCK LOVE BOJANOWSKI & ACEDO, PLC

11 By /s/ Ashlee B. Hesman

Ashlee B. Hesman
3100 West Ray Road, Suite 300
Chandler, Arizona 85226
ahesman@strucklove.com

14 Gina G. Winspear
DENNETT WINSPEAR
3301 North Buffalo Dr., Suite 195
Las Vegas, NV 89129
GWinspear@dennettwinspear.com
Attorneys for Defendant CoreCivic

17 CLARK HILL, PLLC

18 By /s/ Gia N. Marina (w/ permission)

19 Paola M. Armeni
Gia N. Marina
3800 Howard Hughes Pkwy. Ste. 500
Las Vegas, NV 89169
Attorneys for Plaintiff

23 **IT IS SO ORDERED:**

24 
25 UNITED STATES DISTRICT JUDGE

26 DATED: April 11, 2022

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2022, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Paola Armeni parmeni@clarkhill.com
Gia N. Marina gmarina@clarkhill.com

I hereby certify that on this same date, I served the attached document by U.S. Mail, postage prepaid, on the following, who is not a registered participant of the CM/ECF System:

N/A

/s/ Ashlee B. Hesman